act, and all the provisions of this act shall be liberally construed to the end that the use of intoxicating liquor as a beverage may be prevented."

Section 33 declares: "It shall not be unlawful to possess liquor in one's private dwelling while the same is occupied and used by him as his dwelling only and such liquor need not be reported, provided such liquors are for use only for the personal consumption of the owner thereof and his family residing in such dwelling and of his guests when entertained by him therein. * * * After February 1, 1920, the possession of liquors by any person not legally permitted under this title to possess liquor shall be *prima facie* evidence that such liquor is kept for the purpose of being sold, bartered, exchanged, given away, furnished, or otherwise disposed of in violation of the provisions of this title."

In another recent decision the U. S. Supreme Court has held that the War-Time Prohibition Act was not in violation of the Fifth Amendment to the Constitution of the United States as a taking of property without compensation. *Hamilton* v. *Kentucky Distilleries & Warehouse Co.*, 251 U. S. 146. Also that the manufacture of beer containing 2.75 per cent alcohol prior to the enactment of the Volstead measure—that is, under the War-Time Prohibition Act, which did not define "intoxicating"—was legal. *United States* v. *Standard Brewery, Inc.*, 251 U. S. 10. And again that the prohibition of the manufacture of beer and other malt liquor containing as much as one half of one per cent of alcohol by volume, by the Volstead Act, is within the powers of Congress and enforceable. *Jacob Ruppert* v. *Caffey*, 251 U. S. 264.

The Eighteenth Amendment and the Volstead Act have been declared constitutional by the United States Supreme Court in two recent cases. *State of Rhode Island* v. *Palmer*, 40 Sup. Ct. 486; *Hawke* v. *Smith*, 40 Sup. Ct. 495.

For an interesting discussion of the principles involved in these decisions, see Lindsay Rogers, "Life, Liberty, and Liquor", 6 VA. LAW REV. 156, 179. This article throughly covers this ground; to add more than the quotation of the statutes and citations of the decided cases would be repetition.

MASTER AND SERVANT—CHILD LABOR LAW—CONTRIBUTORY NEGLIGENCE.—A statute provided that "no child under the age of fourteen years shall be employed by, or permitted to work in or about, any mill, factory, laundry, manufacturing establishment, or place of amusement; * * *". The plaintiff, a child of eleven years, was employed by the defendant, a manufacturer, in direct violation of the statute. The child brought an action for personal injury contributed to by his own negligence and arising as the proximate result of the employment. *Held*, the plaintiff cannot recover. *Keen* v. *Crosby* (Ga.), 103 S. E. 850. See NOTES, p. 378.

MASTER AND SERVANT—WORKMEN'S COMPENSATION ACTS—SCOPE OF EMPLOYMENT.—At a railway crossing where the deceased was employed by the appellant corporation to protect the public from its trains, there